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MOBITEL COMMENTS ON THE EC INITIATIVE CONCERNING INTERNATIONAL MOBILE ROAMING TARIFFS

Mobitel welcomes the opportunity to comment the Commission's Initiative concerning international mobile roaming tariffs. Mobitel is joining the public consultation with great concern, despite the fact that the proposed Initiative is still at a very early stage.

Mobitel believes the selection of regulatory remedies in the area of International Roaming Tariffs, prior to the outcome of the latest market analysis of markets under the New Regulatory Framework conducted by the local NRAs, and prior to the proper assessment of the current level of competitiveness of International Roaming Tariffs at the national levels, is premature and unreasonable.

Mobitel also believes that intervention at the retail level is inappropriate and would only lower mobile operators' income, thus reducing potential investments in research, advanced technologies and infrastructure. The EU Regulatory Framework on Electronic Communications and the ERG Common Position on the EU Regulatory Framework describe the regulation of prices at retail level as a remedy to be used only as a last resort.

Due to the early stage of the Initiative our observations and comments are of general nature.

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